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Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)

Plaintiff,) Case No. 2:13-cr-0038-APG-PAL

V.

ANDREI RAILEANU,

Defendant.

ORDER

**STIPULATION TO CONTINUE REVOCATION
OF SUPERVISED RELEASE HEARING
(Fifth Request)**

Certification: In accordance with Local Rule 12-1(c), the parties, by and through undersigned counsel, certify that this stipulation is timely filed.

Pursuant to this Court's Local Rule 45-1, the parties respectfully request that the Court approve this stipulation to continue the date for the September 8, 2016 hearing pertaining to revocation of Defendant Andrei Raileanu's supervised release. The parties request that the Court continue the hearing to a date no earlier than October 17, 2016.

In support of this stipulation, the parties rely upon the following points:

1. The government filed a petition in this case on July 21, 2015 seeking revocation of Mr. Raileanu's supervised release (Pacer #92). Based upon the government's petition, this Court issued an arrest warrant for Mr. Raileanu which was successfully executed on August 19,

1 2015 (Pacer #95). The petition for revocation of supervised release filed in this case is partly
2 based upon allegations that are currently being litigated/contested in another criminal case
3 involving Mr. Raileanu. *See* United States v. Andrei Raileanu, 2:15-cr-0250-APG-GWF. Trial
4 is scheduled to commence in that case on October 17, 2016.

5 2. In the interest of judicial economy, the parties agree that continuing the current
6 date for the revocation hearing in this case is appropriate, especially in light of the upcoming trial
7 in the 15-0250 case. Additionally, a continuance is appropriate in light of the fact that the parties
8 are exploring resolution of this and the 15-0250 case. To that end, undersigned counsel for Mr.
9 Raileanu anticipates meeting with him at the detention facility within the next two weeks to
10 discuss potential resolution of this case.

11 3. Mr. Raileanu, who is currently in custody, concurs with this request for a
12 continuance. The parties agree that the revocation hearing in this case should be continued to a
13 date no earlier than October 17, 2016.

14 Respectfully submitted,

15 /s/ Kimberly M. Frayn

16 _____
/s/ Paul S. Padda

17 Kimberly M. Frayn, Esq.

18 _____
Paul S. Padda, Esq.

19 Attorney for the United States

20 _____
Attorney for the Defendant

21 Dated: September 6, 2016

22 _____
Dated: September 6, 2016

23 **ORDER**

24 IT IS SO ORDERED. The Court hereby approves the parties' stipulation seeking to
25 continue the supervised release hearing currently scheduled for September 8, 2016 at 9:00 a.m.
26 The hearing shall be continued to **October 25, 2016** at the hour of **9:30 a.m.**

27 Dated: September 7, 2016.

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29 _____
30 UNITED STATES DISTRICT JUDGE